

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JANE DOE

*Plaintiffs,*

v.

PAUL DRAKE HARRIS

*Defendants.*

Case No.  
**JURY DEMANDED**

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**COMPLAINT**

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Comes now the Plaintiff, JANE DOE, by undersigned counsel and for her complaint against the Defendant state the following:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter under 28 U.S.C. § 1331 with this Complaint arising under a violation under 15 U.S.C. § 6851.
2. Plaintiff asserts claims for relief under 15 U.S.C. § 6851 which authorizes action to redress the nonconsensual transfer of intimate visual depictions using instrumentalities of interstate commerce.
3. This Court is a proper venue for this action pursuant to 28 U.S.C. § 1391(b)(1) and 28 U.S.C. § 1391(b)(2) because one or more defendants reside in this judicial district and all defendants are residents of the State of Tennessee. Additionally, a substantial part of the events or omissions giving rise to this

claim occurred within this judicial district.

#### **PARTIES**

4. Plaintiff Jane Doe is an adult female resident of Tennessee and is currently residing in Cheatham County.
5. Defendant Paul Drake Harris is an adult male resident of Tennessee and is currently residing in Dickson County.

#### **FACTUAL ALLEGATIONS**

6. Between August 2022 and April 2023, Defendant Harris uploaded twenty-six separate intimate videos and images of Plaintiff without her consent to [www.redgifs.com](http://www.redgifs.com) using the username @dredd88.
7. The email account associated with the profile, @dredd8, is pauldrakeharris@gmail.com.
8. In nine of these images, Plaintiff is clearly identifiable, with images depicting her uncovered genitals, pubic area, and/or nipples.
9. The account was managed in such a way as to falsely imply that it belonged to Plaintiff herself.
10. Defendant Harris linked Plaintiff's Instagram Account, and old phone number to @dredd88.
11. Plaintiff is readily identifiable through her Instagram profile and nine of the images uploaded to [www.redgifs.com](http://www.redgifs.com).
12. On December 17, 2023, unknown parties began direct message Plaintiff on Instagram, inquiring about the images that had been posted to

www.redgifs.com.

13. One of the unknown parties sent Plaintiff a link to the @dredd88 account page.
14. On April 24, 2023, Defendant Harris escalated his harassment by sending two separate text messages to Plaintiff's husband.
15. Each text message contained nude images of Plaintiff.
16. The first text message contained three nude photographs of Plaintiff, displaying her pubic area, nipple(s), and/or anus.
17. The second message contained a screen recording of Defendant Harris' photo album titled "Jane," which showed numerous images and videos that displayed Plaintiff's pubic area, nipple(s), and/or anus.
18. The same day, Defendant Harris sent the same screen recording of the photo album titled "Jane" to Plaintiff's mother-in-law on Instagram.
19. On February 6, 2024, Defendant Harris was arrested and charged with nine counts of Unlawful Exposure under T.C.A. § 39-17-318, in Cheatham County:

I, the affiant named below, after being sworn, state under oath that on or about \_\_\_\_\_ Cheatham County, Tennessee, **Paul Drake Harris** committed the offense(s) of violation(s) of T.C.A. § **39-17-318 Unlawful Exposure**. I further state under oath that the essential facts constituting the offense(s), the sources of my information and the reasons why this information is believable and reliable are as follows:

Pursuant complaint and investigation of private videos of the victim being placed on a website (www.redgifs.com) and shared with the victims mother in law and husband, it was determined that the videos in question were produced and provided to the listed defendant by the victim with the understanding that they were for his personal viewing only. Since the has victim ended the relationship with the defendant, she has been made aware that the videos were placed on the www.redgifs.com website, a known pornography website, by a user under the name/handle of @dredd88 also referred to as dredd88 via the same site.

During the investigation, information obtained from the www.redgifs.com site, provided an email address associated with the @dredd88 account as being listed as pauldrakeharris@gmail.com

Further investigation showed that between August of 2022 and April of 2023, 26 separate videos were upload by this user. 9 of those videos depicted the breast, buttocks, or frontal view of the primary genital area. Victim further stated that the release of these videos to the website and to her spouse and mother in law has resulted in embarrassment and emotional distress. Victim further stated that the defendant had previously threatened to release the videos in an attempt to coerce her to continue the relationship with him.

## DAMAGES

20. Based on the direct and proximate results of the Defendant's violations of 15 U.S.C. § 6851, Plaintiff request compensation for:

a) Mental suffering and emotional distress

21. Based on the intentional and reckless misconduct in Count 1, Plaintiff requests an award of punitive damages against Paul Drake Harris.

### **REQUEST FOR RELIEF**

Based upon all of the foregoing, Plaintiff:

- I. Process be issued and that each Defendant be required to respond within the time provided by the Federal Rules of Civil Procedure;
- II. A jury be empaneled to try this case;
- III. That Declaratory Judgment be entered against Defendant for Count 1;
- IV. That Plaintiff be awarded liquidated damages in the amount of \$150,000.00 for each transmission of intimate visual depictions against Defendant Harris for Count 1;
- V. That Plaintiff be awarded reasonable attorney's fees, costs, and expenses under 15 U.S.C. § 6851;
- VI. For pre- and post-judgment interest on all damages awarded;
- VII. For such other, further, and general relief as the Court deems just and appropriate.

Respectfully submitted,

/s/ Paul D Randolph

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